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FILED	RECEIVED
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FEB 12 2020	
CLERK US DISTRICT COURT DISTRICT OF NEVADA	
BY: _____	DEPUTY _____

11 Attorney for Kenneth Moore

12 UNITED STATES DISTRICT COURT

13 DISTRICT OF NEVADA

ORDER

14 United States of America,

15 Plaintiff,

16 v.

17 Kenneth Moore and Latoya Jones,

18 Defendants.

Case No. 2:19-mj-00363-VCF

~~Stipulation to Continue Preliminary~~
Hearing
(Fifth Request)

19 The parties jointly request that this Court vacate the preliminary hearing scheduled for
20 February 13, 2020, and continue it for at least 45 days because:

21 1. The government intends on making an early production of discovery to the
22 defendants in an effort to reach a pre-indictment plea agreement and lab test results remain
23 outstanding. The government intends to disclose more discovery as it becomes available, and
24 defense counsel will need time to review this discovery and discuss it with their clients.

25 2. A pre-indictment plea agreement would obviate the need for either a
26 preliminary hearing or indictment by a grand jury.

3. Defendants are not incarcerated and do not object to a continuance.

1 4. Denial of this continuance would potentially prejudice the defendants and the
2 government and would unnecessarily consume this Court's valuable resources.

3 5. Additionally, denial of this continuance could result in a miscarriage of justice.
4 The additional time is excludable in computing the time within which the trial must
5 commence under the Speedy Trial Act, 18 U.S.C. 3161(h)(7)(A), considering the factors
6 under § 3161(h)(7)(B)(i), (iv).

7 DATED: February 10, 2020.

8 Rene L. Valladares
9 Federal Public Defender

Nicholas A. Trutanich
United States Attorney

10 /s/ Erin Gettel
11 By _____

/s/ Shaheen Torgoley
By _____

12 Erin Gettel
13 Assistant Federal Public Defender

Shaheen Torgoley
Assistant United States Attorney

14 /s/ Chris T. Rasmussen
15 By _____

16 Chris T. Rasmussen
17 Counsel for Latoya Jones

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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

United States of America,
Plaintiff,

v.

Kenneth Moore and Latoya Jones,
Defendant.

Case No. 2:19-mj-00363-VCF

**Order Granting Fifth Stipulation to
Continue Preliminary Hearing**

Based on the Stipulation of counsel and good cause appearing,

IT IS ORDERED that the preliminary hearing currently scheduled on February 13,
2020, at 4:00 p.m. is vacated and continued to April 3, 2020 at the hour of 4:00
p.m. Courtroom 3D.

DATED this 12th day of February, 2020.



CAM FERENBACH
UNITED STATES MAGISTRATE JUDGE